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UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**DECLARATION OF RICHARD A.
BODNAR IN SUPPORT OF THE RKS
CLAIMANTS' MOTION TO ENFORCE
THE ADR PROCEDURES ORDER AND
ESTABLISH A MARCH 20, 2023
DEADLINE TO OBJECT TO RKS
CLAIMANTS' CLAIMS**

Hearing Information:

Date: March 7, 2023
Time: 10:00 a.m. (Pacific Time)
Place: (Telephone or Video Only)
United States Bankruptcy Court
Courtroom 17, 16th Floor
San Francisco, CA 94102

Objection Deadline:
February 21, 2023, 4:00 p.m. (Pacific Time)

Pursuant to 28 U.S.C. § 1746, I, Richard A. Bodnar, under penalty of perjury, hereby declare as follows:

1. I am a Partner at the law firm Rolnick Kramer Sadighi LLP (“**RKS**” or “**Claimants’ Counsel**”), counsel to the claimants listed on Schedule A to the accompanying motion (collectively, the “**RKS Claimants**”). I submit this declaration in support of the RKS Claimants’ Motion to Enforce the ADR Procedures Order and Establish a March 20, 2023 deadline to object to the RKS Claimants’ Claims (the “**Motion**”).¹

2. On October 25, 2022, Reorganized Debtors moved for a fifth extension of the claims objection deadline, seeking a 270-day extension (the “**Fifth Objection Motion**”).

3. On November 8, 2022, certain of the RKS Claimants (the “**Kingstown Claimants**”) objected to the Fifth Extension Motion, and they were joined by numerous others of the RKS Claimants.

4. Prior to the hearing date on the Fifth Extension Motion, the Reorganized Debtors offered to mediate promptly with the RKS Claimants if they agreed to withdraw their objection.

5. The RKS Claimants agreed to Reorganized Debtors’ offer and, as a result, withdrew their objections and scheduled a prompt mediation with Reorganized Debtors.

6. On January 19, 2023, I attended the mediation the RKS Claimants agreed to in exchange for withdrawing their objection to the Fifth Extension Motion.

7. While I am unable to discuss specifics of the mediation, it was clear to me that Reorganized Debtor did not mediate in good faith. The mediation was thus doomed to fail from the start, and that is in fact what happened. The mediation was terminated on January 19, 2023.

8. Attached hereto as **Exhibit 1** is a true and correct copy of the Third Amended Consolidated Class Action Complaint, filed in the Consolidated Class Action on May 28, 2019.

9. Attached hereto as **Exhibit 2** is a true and correct copy of the Transcript of Proceedings Before the Honorable Dennis Montali, U.S.B.J., dated November 18, 2020, regarding the ADR Procedures Motion and the Second 7023 Motion.

¹ Capitalized terms that are not defined herein have the same meaning as in the Motion.

1 10. Attached hereto as **Exhibit 3** is a true and correct copy of the Transcript of
2 Proceedings Before the Honorable Dennis Montali, U.S.B.J., dated December 4, 2020, containing
3 the oral ruling on the ADR Procedures Motion and the Second 7023 Motion.

4 11. Attached hereto as **Exhibit 4** is a true and correct copy of the Transcript of
5 Proceedings Before the Honorable Dennis Montali, U.S.B.J. dated November 30, 2022.

6 I declare under penalty of perjury of the laws of the United States that the foregoing is true
7 and correct.

8 Executed on February 6, 2023.

9
10 By: /s/ Richard A. Bodnar
 Richard A. Bodnar